

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 24-cv-24126-WILLIAMS

AMERICAN CIVIL LIBERTIES UNION  
OF FLORIDA, INC.,

Plaintiff,

v.

UNITED STATES IMMIGRATION AND  
CUSTOMS ENFORCEMENT; UNITED  
STATES DEPARTMENT OF HOMELAND  
SECURITY,

Defendants.

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**JOINT MOTION TO FURTHER MODIFY BRIEFING SCHEDULE**

To promote judicial economy and for good cause shown, the parties jointly move to extend the summary judgment briefing schedule in this matter. As grounds, the parties state:

1. Plaintiff ACLU of Florida filed this action seeking relief under the Freedom of Information Act, 552 U.S.C. § 552, for ICE's alleged failure to respond as required by FOIA to three requests for information related to two individuals' detention in ICE custody at the Baker County Detention Center in Macclenny, Florida.

2. Since the filing of the Complaint, ICE has rendered determinations with respect to ACLU of Florida's three FOIA requests. The agency produced responsive material with respect to the third FOIA request (Request No. 2024-ICFO-53110). Further, the agency initially invoked Exemption 7A with respect to the first two FOIA requests (Request Nos. 2024-ICFO-20675 and 2024-ICFO-20679) on the grounds that the material requested was compiled for law enforcement purposes and its disclosure could reasonably be expected to interfere with enforcement

proceedings, but the agency has now confirmed that such law enforcement proceedings have concluded and it will process records responsive to ACLU of Florida's first two FOIA requests. *See* ECF No. 12.

3. With respect to these first two requests, ICE produced responsive video footage and 16 pages of records on June 24, 2025, additional video footage and 576 pages of records on July 31, 2025, two video clips on August 27, 2025, and a video clip on September 30, 2025. ICE has advised that it expects an additional production of video footage in the coming days. ICE has also represented that there are approximately 20 hours of video remaining responsive to these requests, which will require extensive time to process.

4. Given that processing was delayed during the lapse in appropriations and will not conclude prior to the upcoming January 2026 summary judgment deadlines in this case, and given that the completion of such processing may resolve or significantly narrow the issues to be raised at summary judgment, the parties respectfully request that the Court extend the briefing schedule. Based on ICE's representations concerning the time required to process remaining video footage, the parties respectfully request the briefing schedule be deferred by eight months to allow for such processing. The parties propose the following deadlines:

	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Deadline to file any motions for summary judgment:	January 15, 2026	September 15, 2026
Deadline to file any responses to motions for summary judgment:	February 20, 2026	October 20, 2026
Deadline to file any replies in support of any motion for summary judgment:	March 6, 2026	November 6, 2026

5. This motion is made in good faith and for purposes of streamlining the matter to avoid judicial waste. The parties will continue to file joint status reports every 45 days pursuant to the Court's Paperless Order, ECF Nos. 10 & 14.

Dated: December 19, 2025

Respectfully submitted,

/s/ James M. Slater

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